

Message

From: Jones, Russell [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4795FDC630C34BE4AED0C6416A20D606-RUSSELL JONES]
Sent: 3/14/2019 4:24:53 PM
To: Sisco, Debby [Sisco.Debby@epa.gov]
Subject: RE: need by 12:00 -- FW: Draft OPP ANNOUNCEMENT on Plant Biostimulants Guidance in Fed Reg - closing out review

Importance: High

Debby:

Please remove the "and pesticides" from the statement.

Russ

Russell S. Jones, Ph.D., Senior Scientist
Chair, Biochemical Classification Committee
Risk Assessment Branch
Biopesticides & Pollution Prevention Division
Office of Pesticide Programs
US Environmental Protection Agency

P: 703-308-5071; F: 703-308-7026
jones.russell@epa.gov

Office Location:
One Potomac Yard
2777 South Crystal Drive Arlington, VA 22202

Mailing Address:
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001
<http://www.epa.gov/pesticides>



From: Sisco, Debby
Sent: Thursday, March 14, 2019 12:22 PM
To: Strauss, Linda <Strauss.Linda@epa.gov>
Cc: Overbey, Dian <Overbey.Dian@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Jones, Russell <Jones.Russell@epa.gov>; McNally, Robert <Mcnally.Robert@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>
Subject: RE: need by 12:00 -- FW: Draft OPP ANNOUNCEMENT on Plant Biostimulants Guidance in Fed Reg - closing out review

Linda,

Working with Russ and Bob, this is what we think we can say:

The biostimulants industry believes that biostimulants can improve soil health and optimize nutrient use and therefore increase plant growth, vigor and yield and thus reduce the need for fertilizers and pesticides.

We have absolutely no evidence that they are useful for site restoration and/or remediation activities.

Debby Sisco

Ethics Officer and Special Assistant to the Director
Office of Pesticide Programs (7501P)
US Environmental Protection Agency
4th floor - 4241 Potomac Yard South
(office: 703 308-8121; Mobile: 571 317-4823)

From: Jones, Russell
Sent: Thursday, March 14, 2019 12:02 PM
To: Sisco, Debby <Sisco.Debby@epa.gov>; McNally, Robert <McNally.Robert@epa.gov>
Cc: Overbey, Dian <Overbey.Dian@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Strauss, Linda <Strauss.Linda@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>
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Debby:

The text regarding pesticides needs to be removed. There is no documentation in the literature demonstrating that the use of Plant Biostimulants can reduce the use of pest control pesticides.

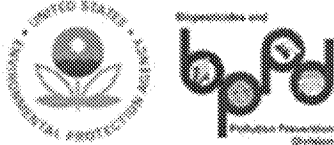
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From: Sisco, Debby
Sent: Thursday, March 14, 2019 11:59 AM
To: Jones, Russell <Jones.Russell@epa.gov>; McNally, Robert <McNally.Robert@epa.gov>
Cc: Overbey, Dian <Overbey.Dian@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Strauss, Linda <Strauss.Linda@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>
Subject: RE: need by 12:00 -- FW: Draft OPP ANNOUNCEMENT on Plant Biostimulants Guidance in Fed Reg - closing out

review

Importance: High

Russ, Bob,

Tate is the Associate Administrator of the Office of Public Engagement and Environmental Education, which is in the Administrator's Office. If her language is just superfluous but correct, that's okay. If it is wrong, we need to correct it.

Would it be wrong to say this?

Because biostimulants can improve soil health and optimize nutrient use, they can increase plant growth, vigor and yield and thus reduce the need for fertilizers and pesticides.

Debby Sisco

Ethics Officer and Special Assistant to the Director
Office of Pesticide Programs (7501P)
US Environmental Protection Agency
4th floor - 4241 Potomac Yard South
(office: 703 308-8121; Mobile: 571 317-4823)

From: Jones, Russell

Sent: Thursday, March 14, 2019 10:25 AM

To: McNally, Robert <McNally.Robert@epa.gov>; Sisco, Debby <Sisco.Debby@epa.gov>

Cc: Overbey, Dian <Overbey.Dian@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>

Subject: RE: need by 12:00 -- FW: Draft OPP ANNOUNCEMENT on Plant Biostimulants Guidance in Fed Reg - closing out review

Importance: High

Debby/Bob:

My first reaction would be that this is superfluous language that is completely unnecessary.

Furthermore, the following text "...and less need for pesticides, and also shows potential to be useful in site restoration and remediation. "

Is completely and thoroughly inaccurate. Plant biostimulants do not have any pest control activity, do not reduce the need for pest control products, and ARE NOT in any way useful for site restoration and/or remediation activities.

Who the heck is Tate Bennett and why is he making these uninformed 11th hour changes???

Russ J

Russell S. Jones, Ph.D., Senior Scientist
Chair, Biochemical Classification Committee
Risk Assessment Branch
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1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001
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From: McNally, Robert

Sent: Thursday, March 14, 2019 9:24 AM

To: Sisco, Debby <Sisco.Debby@epa.gov>; Jones, Russell <Jones.Russell@epa.gov>

Cc: Overbey, Dian <Overbey.Dian@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>

Subject: RE: need by 12:00 -- FW: Draft OPP ANNOUNCEMENT on Plant Biostimulants Guidance in Fed Reg - closing out review

I think Russ is out. Let me take a look at this and compare it with our guidance. I hope to have comments by noon, but I have a busy morning.

From: Sisco, Debby

Sent: Thursday, March 14, 2019 9:22 AM

To: McNally, Robert <McNally.Robert@epa.gov>; Jones, Russell <Jones.Russell@epa.gov>

Cc: Overbey, Dian <Overbey.Dian@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>

Subject: FW: need by 12:00 -- FW: Draft OPP ANNOUNCEMENT on Plant Biostimulants Guidance in Fed Reg - closing out review

Bob, Russ,

Please look at the language in red (from Tate Bennett) and let us know if it is accurate. And if not, please explain why it could create a problem.

Debby Sisco

Ethics Officer and Special Assistant to the Director
Office of Pesticide Programs (7501P)
US Environmental Protection Agency
4th floor - 4241 Potomac Yard South
(office: 703 308-8121; Mobile: 571 317-4823)

From: Strauss, Linda

Sent: Thursday, March 14, 2019 8:52 AM

To: Sisco, Debby <Sisco.Debby@epa.gov>

Cc: Dunton, Cheryl <Dunton.Cheryl@epa.gov>

Subject: need by 12:00 -- FW: Draft OPP ANNOUNCEMENT on Plant Biostimulants Guidance in Fed Reg - closing out review

Hi Debby. Long time no talk.

Alex wants us to work in the language in red (from Tate Bennett) somewhere. Can you check? We should keep her language (if accurate). Thanks!

EPA Releases for Public Comment Draft Guidance for Plant Regulators, Including Plant Biostimulants

On Month Day, 201X, EPA released for public comment Draft Guidance for Plant Regulators, Including Plant Biostimulants. In recognition of the growing categories of products generally known as plant biostimulants, this draft document gives guidance on which products are (and are not) subject to regulation under FIFRA as plant regulator pesticides, and what kinds of claims can be made for them. The draft guidance provides examples of each. EPA is taking this step to provide clarity to our state regulatory partners, to industry, and to the interested public in this-emerging product area.

Plant biostimulants are a relatively new, but growing, category of products containing naturally occurring substances and microbes that are used to stimulate plant growth, enhance resistance to plant pests, and reduce abiotic stress. Their increasing popularity arises from their ability to enhance agricultural productivity by stimulating natural processes in the plant and in soil, using substances and microbes already present in the environment.

Biostimulants improve soil health, optimize nutrient use, and increase plant growth, vigor, yield and production. The work that biostimulants perform allows for less fertilizer use and less need for pesticides, and also shows potential to be useful in site restoration and remediation. They can promote greater water and nutrient use efficiency but do not provide any nutritionally relevant fertilizer benefit to the plant. Plant biostimulant products can be used in sustainable agriculture production systems and integrated pest management (IPM) programs, which in turn can reduce the use of irrigation water, as well as agrochemical supplements and fertilizers.

Please submit public comments on this guidance on www.regulations.gov in Docket # EPA-HQ-OPP-201X-XXX on or before XXXX, XXXX [insert date 60 days after publication in Federal Register].

From: Dunn, Alexandra

Sent: Thursday, March 14, 2019 7:57 AM

To: Bennett, Tate <Bennett.Tate@epa.gov>; Strauss, Linda <Strauss.Linda@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Baptist, Erik <Baptist.Erik@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; McFaul, Jessica <mcfaul.jessica@epa.gov>; Block, Molly <block.molly@epa.gov>; Konkus, John <konkus.john@epa.gov>

Subject: RE: Draft OPP ANNOUNCEMENT on Plant Biostimulants Guidance in Fed Reg - closing out review

Thanks for the input Tate; this won't be ready to go til next week. So your point on timing is good. The Tick Tock includes notice to the alliance and coalitions you mention – one on one calls is I believe the intent.

Linda, pls work the language in Red into the LISTSERV announcement. We're not doing a press release since it's a draft guidance but are tweeting and doing the list serv.

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-2910
dunn.alexandra@epa.gov

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